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October 6, 2022

VIA ECF

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 520
New York, NY 10007

USDC SDNY
DOCUMENT
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DATE FILED: 10/12/2022

RE: Case: US v. Igor Resnik
Case No.: 21-cr-00058-MKV

Dear Judge Vyskocil:

I am the Attorney for Mr. Resnik, and I write the Court seeking a modification of the conditions of Mr. Reznik's pretrial release.

As a matter of background, the terms of Mr. Reznik's release were a \$250,000 Personal Recognizance Bond to be signed by four financially responsible people, home detention, GPS monitoring, and supervision by Pre-Trial Services. These conditions were set in the beginning of March 2021. By Order of this Court, on March 24, 2022, Your Honor modified the terms of Mr. Reznik's release to end home detention in favor of continued electronic location monitoring and a curfew to be enforced by Pre-Trial Services.

I now come before the Court to respectfully request that the Court lift the electronic location monitoring and curfew conditions of Mr. Reznik's release.

The reason for this request is because Mr. Reznik's wife, Anastasiia Kultina, is pregnant and requires frequent doctor's visits in New York City. Annexed hereto, is a letter from Mrs. Kultina's doctor, Samantha Bosse, MD which states that due to complications in the pregnancy, Mrs. Kultina requires frequent monitoring in New York City.

Initially, I contacted Pre-Trial Services to request their position on a request to modify the terms of the curfew so as to allow Mr. Reznik to stay at a friend's apartment in New York a few days a week so that the two of them do not need to drive all the way to and from Maryland every time they have a doctor's appointment. Pre-Trial Services informed me that they could not consent to this request as Mr. Reznik remains on location monitoring. Pre-Trial Services clarified that a person on electronic location monitoring needs to be within range of the base unit that is installed in their residence, therefore, Pre-Trial cannot consent to overnight stays outside of the residence.

However, I further enquired as to their position regarding removing electronic location monitoring, I was informed by Ashley Cosme, Intensive Supervision Specialist, that as long as Mr. Reznik remains compliant, Pre-Trial Services would consent to the removal of location monitoring

Once I learned of Pre-Trial Services position on these requests, I contacted Mr. Rebold, the Government's attorney, to seek the Government's position. The Government consents to Mr. Reznik's request to occasionally travel overnight to New York to attend the above-described medical appointments. Because Pre-Trial requires, as a prerequisite, that electronic monitoring be removed in order to allow for these trips, the Government further consents to this change in bail conditions, especially in light of Mr. Reznik's full compliance with the terms of his release.

Based upon the foregoing, Mr. Reznik respectfully request that the Court remove location monitoring and the curfew requirement as a condition of Mr. Reznik's release so as to allow him to accompany his wife to New York for her necessary medical appointments, and stay overnight periodically in New York during the continued pendency of this matter.

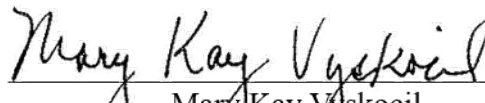
Respectfully,



Michael Fineman, Esq.

The requested bail modification to remove location monitoring is GRANTED on the condition that Mr. Reznik advises Pre-Trial Services of his travel in advance and checks in with Pre-Trial Services upon his return to Maryland. The curfew condition is lifted only on the days that Mr. Reznik accompanies his wife to New York for necessary medical appointments. At all other times, Mr. Reznik's curfew conditions remain in effect. SO ORDERED.

Date: 10/12/2022
New York, New York


Mary Kay Vyskocil
United States District Judge

9/6/2022

To whom this may concern,

Anastasiia Kultina (DOB [REDACTED]) is currently pregnant and prenatal care is being done in NYC. She has complications in pregnancy that require frequent monitoring. It has cause tremendous stress with the amount of commuting especially in 1 day. Please take this in account regarding her partner's circumstances. Please consider consideration for longer duration of time in NYC.

Sincerely,



[REDACTED]
Samantha Bosse MD, MPH (she/her)
OB/GYN, Women's Health Department
AdvantageCare Physicians

P 646-680-5814

acpny.com



Samantha Bosse, M.D.